

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MICHIGAN**

**FLEET ENGINEERS, INC.**

a Michigan Corporation,

Plaintiff

v.

**MUDGUARD TECHNOLOGIES, LLC**

a Tennessee limited liability company,

**TARUN SURTI**

an Individual,

Defendant

Case No. 1:12-CV-1143

Hon. Paul L. Maloney

**FILED - KZ**

April 3, 2020 11:25 AM

U.S. DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN

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**PRO SE DEFENDANT'S SECOND MOTION FOR SUMMARY JUDGMENT**

**“REQUEST TO ENTER JUDGMENT EXPEDITIOUSLY”**

WHEREFORE, Pro Se Defendant, Mr. Surti, hereby moves this Court and requests that this honorable Court to enter a summary judgment, without claim 19, declaring that Plaintiff has directly infringed, contributorily infringed, and induced infringement of one or more claims of the ‘755 reissue Patent.

1. Finding that claim 1, 2, 5, 8, 9, and 13 of United States Patent No. RE 44,755 are literally infringed by Plaintiff's Aero-Flap brand mud flaps part nos. 033-08001, 033-08002, and 033-08004. (Exhibit A-C)
2. Finding that claim 1, 2, 5, 8, 9, and 13 of United States Patent No. RE 44,755 are infringed under the doctrine of equivalents by Plaintiff's Aero-Flap brand mud flaps part nos. 033-08001. (Exhibit A-C)
3. Issuing a permanent “Cease and Desist Order” against the Plaintiff, Fleet Engineers Inc.

4. Issuing a permanent “Cease and Desist Order” against makers, sellers, buyers, users, importers and exporters of Aero-Flap brand mud flaps.
5. Awarding all costs and fees incurred in connection with this action to the Defendants.
6. Awarding the Defendants damages, including lost profits, such damages to be trebled; and
7. Awarding such other and further relief as this court may deem proper, including reasonable attorney fees, this being an exceptional case.

**JURY TRIAL**

**A JURY TRIAL IS DEMANDED.**

Respectfully submitted,

Dated: March 31, 2020

By: \_\_\_\_\_



Tarun N. Surti, Individually  
President, Mudguard Technologies, LLC  
Pro Se Defendants  
5928 Westheimer Drive  
Brentwood, TN 37027  
Tel: (615) 812-6164  
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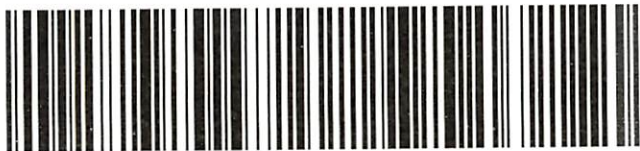
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